



Kathleen R. Hartnett
T: +1 415 693 2071
khartnett@cooley.com

November 11, 2025

The Honorable Judge Vince Chhabria
450 Golden Gate Avenue
17th Floor, Courtroom 4
San Francisco, CA 94102

Dear Judge Chhabria:

We write in response to the “notice” filed by Plaintiffs earlier today, which does not pertain to issues raised in their administrative motion but instead to voluntary, previously-noted follow-ups that Meta has been undertaking regarding RFP 137 (i.e., the baseball arbitration RFP), in particular with respect to Ms. Wang’s documents.

Specifically, after Meta made a small production yesterday of additional documents from Ms. Wang’s computer, Plaintiffs wrote Meta last night asking for clarification about that production. Meta was in the process of responding to Plaintiffs’ email when Plaintiffs suddenly filed the notice. Had Plaintiffs waited for Meta’s email response, Plaintiffs would have received confirmation from Meta that yesterday’s production was of documents identified as part of Meta’s additional collection from Ms. Wang’s computer, which Meta voluntarily agreed to carry out as explained during the parties’ previous meet and confers, along with a few other voluntary Meta follow-ups, such as production of parquet files (which have now already been produced), file lists for Ms. Wang’s recently identified downloads (which also have now already been produced), and TAR file lists (to be produced shortly). These files relate to 2024 torrenting activity by Ms. Wang previously disclosed to Plaintiffs; as mentioned at yesterday’s hearing, this 2024 activity is why Meta has voluntarily offered Ms. Wang for a properly scoped Rule 30(b)(1) deposition. This additional collection from Ms. Wang’s computer, and Meta’s agreement to make a further production of responsive files that it located based on that additional collection, was not part of the relief sought by Plaintiffs’ motion, but instead was part of Meta’s ongoing, good-faith, and nearly completed follow-up regarding RFP 137. Meta thus disagrees with Plaintiffs’ contention that this production somehow supports their request for further discovery; on the contrary, it demonstrates that no additional discovery other than a time-limited Rule 30(b)(1) deposition of Ms. Wang regarding her torrenting-related activities in 2024 is appropriate, particularly at this stage of the case.

Meta further objects to the suggestion in Plaintiffs’ notice that they have requested that the Court allow Dr. Choffnes to inspect Meta’s S3 folders and computers. Plaintiffs did not request this relief in their motion, which is not properly sought now; there also is no basis for such relief.

Thank you for your consideration.



The Honorable Judge Vince Chhabria
November 11, 2025
Page Two

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Kath R. Hartnett".

Kathleen R. Hartnett